

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

CARMEN LILIA MENDEZ DE VACHON

Plaintiff,

v.

KATHLEEN KILIAN MENDEZ and the  
SUCCESSION OF JOSE F. GONZALEZ  
ALONSO, composed of JOSE PEDRO  
GONZALEZ KILIAN, LARA ELISA  
GONZALEZ KILIAN, FRANCISCO JOSE  
GONZALEZ KILIAN and JUAN CARLOS  
GONZALEZ KILIAN

Defendants

CIVIL NO: 96-1654 (cc)

ACTION FOR:

ACTION FOR: DECLARATORY  
JUDGMENT AND COLLECTION OF  
MONIES

**MOTION FILING PROPOSED ORDER AND APPOINTMENT OF SPECIAL MASTER**

TO THE HONORABLE COURT:

COMES NOW Plaintiff, represented by its undersigned counsel, and most respectfully  
states and prays:

1. We are herewith filing a proposed order. It is further requested that Adam  
McDonough, of legal age, married, realtor and resident of Guaynabo, Puerto Rico, who is not  
related to any of the parties herein be named as Special Master to execute the Deed of Transfer.

WHEREFORE, it is respectfully requested that this Honorable Court accept same.

In San Juan, Puerto Rico, this 26<sup>th</sup> day of June, 2006.

s/Ronald L. Rosenbaum  
**Ronald L. Rosenbaum**  
USDC 114403  
Attorney for Plaintiff  
**LAW OFFICES OF RONALD L. ROSENBAUM**  
414 Muñoz Rivera Avenue  
Suite 7-A  
Hato Rey, Puerto Rico 00918  
Tel. 787-274-5440

Fax 787-274-5442